

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

MASTER DOCKET

18-md-02865-LAK

This document relates to: The cases identified in  
Appendix A.

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**MOTION FOR ISSUANCE OF REQUESTS FOR INTERNATIONAL JUDICIAL  
ASSISTANCE TO OBTAIN EVIDENCE IN DENMARK**

PLEASE TAKE NOTICE that the undersigned attorneys for the individual and entity defendants identified in Appendix A (collectively, “Defendants”), will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of Requests for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, Defendants rely upon the accompanying Memorandum of Law and Declaration of Sharon L. McCarthy dated March 6, 2021 and the exhibits attached thereto.

Dated: New York, New York  
March 6, 2021

Respectfully submitted,

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Management LLC Roth 401(K) Plan,  
Dicot Technologies LLC Roth  
401(K) Plan, Fairlie Investments  
LLC Roth 401(K) Plan, First Ascent  
Worldwide LLC Roth 401(K) Plan,  
Battu Holdings LLC Roth 401(K)  
Plan, Cantata Industries LLC Roth  
401(K) Plan, Crucible Ventures LLC  
Roth 401(K) Plan, Monomer  
Industries LLC Roth 401(K) Plan,  
Limelight Global Productions LLC  
Roth 401(K) Plan, Loggerhead  
Services LLC Roth 401(K) Plan,  
PAB Facilities Global LLC Roth  
401(K) Plan, Plumrose Industries  
LLC Roth 401(K) Plan, Pinax  
Holdings LLC Roth 401(K) Plan,  
Roadcraft Technologies LLC Roth  
401(K) Plan, Sternway Logistics  
LLC Roth 401(K) Plan, Trailing  
Edge Productions LLC Roth 401(K)  
Plan, True Wind Investments LLC  
Roth 401(K) Plan, Eclouge Industry  
LLC Roth 401(K) Plan, Vanderlee  
Technologies Pension Plan,  
Vanderlee Technologies Pension  
Plan Trust, Cedar Hill Capital  
Investments LLC Roth 401(K) Plan,  
Green Scale Management LLC Roth  
401(K) Plan, Fulcrum Productions  
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Group of New York, L.P. Pension  
Plan, DW Construction, Inc.  
Retirement Plan, Kamco Investments  
Inc. Pension Plan, Kamco LP Profit  
Sharing Pension Plan, Linden  
Associates Defined Benefit Plan,  
Moir Associates LLC 401K Plan,*

*Newsong Fellowship Church 401K Plan, Riverside Associates Defined Benefit Plan, Robert Crema, Stacey Kaminer, Alexander Jamie Mitchell III, David Schulman, Joan Schulman, and Darren Wittwer*

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## APPENDIX A

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Elizabeth van Merkensteijn		19-cv-01893
Azalea Pension Plan		19-cv-01893
Basalt Ventures LLC Roth 401(K) Plan		19-cv-01866
Bernina Pension Plan		19-cv-01865
Bernina Pension Plan Trust		19-cv-10713
Michelle Investments Pension Plan		19-cv-01906
Omineca Pension Plan		19-cv-01894
Omineca Trust		19-cv-01794 19-cv-01798 19-cv-01788 19-cv-01918 19-cv-01928

		19-cv-01931 19-cv-01800 19-cv-01803 19-cv-01809 19-cv-01818 19-cv-01801 19-cv-01810 19-cv-01813
Remece Investments LLC Pension Plan		19-cv-01911
Starfish Capital Management LLC Roth 401(K) Plan		19-cv-01871
Tarvos Pension Plan		19-cv-01930
Voojo Productions LLC Roth 401(K) Plan		19-cv-01873
Xiphias LLC Pension Plan		19-cv-01924
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Jocelyn Markowitz		19-cv-01904
Avanix Management LLC Roth 401(K) Plan		19-cv-01867



Batavia Capital Pension Plan Calypso Investments Pension Plan		19-cv-01895 19-cv-01904
Cavus Systems LLC Roth 401(K) Plan		19-cv-01869
Hadron Industries LLC Roth 401(K) Plan		19-cv-01868
RJM Capital Pension Plan		19-cv-01898
RJM Capital Pension Plan Trust		19-cv-10713
Routt Capital Pension Plan		19-cv-01896
Routt Capital Trust		19-cv-01783 19-cv-01922 19-cv-01926 19-cv-01929 19-cv-01812 19-cv-01870 19-cv-01792 19-cv-01806 19-cv-01808 19-cv-01815
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RAK Investment Trust		
Aerovane Logistics LLC Roth 401(K) Plan		18-cv-07828
Edgepoint Capital LLC Roth 401(K) Plan		18-cv-07827
Headsail Manufacturing LLC Roth 401(K) Plan		18-cv-07824

The Random Holdings 401(K) Plan		18-cv-07829
The Stor Capital Consulting LLC 401(K) Plan		18-cv-04434
Joseph Herman	Michelle A. Rice Kaplan Rice LLP 142 West 57 <sup>th</sup> Street Suite 4A New York N.Y. 10019 (212) 333-0227 <a href="mailto:mrice@kaplanrice.com">mrice@kaplanrice.com</a>	1:19-cv-01785
		1:19-cv-01781
		1:19-cv-01791
		1:19-cv-01794
David Zelman		1:19-cv-01918
		1:19-cv-01783
		1:19-cv-01798
		1:19-cv-01788
		1:19-cv-01926
Edwin Miller		1:19-cv-01922
		1:19-cv-01928
		1:19-cv-01929
		1:19-cv-01931
		1:19-cv-01809
Ronald Altbach		1:19-cv-01800
		1:19-cv-01803
		1:19-cv-01812
		1:19-cv-01818
		1:19-cv-01806
Perry Lerner		1:19-cv-01870
		1:19-cv-01792
		1:19-cv-01808
		1:19-cv-01815
		1:19-cv-01801
		1:19-cv-01810
		1:19-cv-01813
Ballast Ventures LLC Roth 401(K) Plan		1:19-cv-01781
Bareroot Capital Investments LLC Roth 401(K) Plan		1:19-cv-01783

Albedo Management LLC Roth 401(K) Plan		1:19-cv-01785
Dicot Technologies LLC Roth 401(K) Plan		1:19-cv-01788
Fairlie Investments LLC Roth 401(K) Plan		1:19-cv-01791
First Ascent Worldwide LLC Roth 401(K) Plan		1:19-cv-01792
Battu Holdings LLC Roth 401(K) Plan		1:19-cv-01794
Cantata Industries LLC Roth 401(K) Plan		1:19-cv-01798
Crucible Ventures LLC Roth 401(K) Plan		1:19-cv-01800
Monomer Industries LLC Roth 401(K) Plan		1:19-cv-01801
Limelight Global Productions LLC Roth 401(K) Plan		1:19-cv-01803
Loggerhead Services LLC Roth 401(K) Plan		1:19-cv-01806
PAB Facilities Global LLC Roth 401(K) Plan		1:19-cv-01808
Plumrose Industries LLC Roth 401(K) Plan		1:19-cv-01809
Pinax Holdings LLC Roth 401(K) Plan		1:19-cv-01810
Roadcraft Technologies LLC Roth 401(K) Plan		1:19-cv-01812
Sternway Logistics LLC Roth 401(K) Plan		1:19-cv-01813

Trailing Edge Productions LLC Roth 401(K) Plan		1:19-cv-01815
True Wind Investments LLC Roth 401(K) Plan		1:19-cv-01818
Eclouge Industry LLC Roth 401(K) Plan		1:19-cv-01870
Vanderlee Technologies Pension Plan		1:19-cv-01918
Vanderlee Technologies Pension Plan Trust		1:19-cv-01918
Cedar Hill Capital Investments LLC Roth 401(K) Plan		1:19-cv-01922
Green Scale Management LLC Roth 401(K) Plan		1:19-cv-01926
Fulcrum Productions LLC Roth 401(K) Plan		1:19-cv-01928
Keystone Technologies LLC Roth 401(K) Plan		1:19-cv-01929
Tumba Systems LLC Roth 401(K) Plan		1:19-cv-01931
Sander Gerber Sander Gerber Pension Plan	Stephen D. Andrews Amy B. McKinlay Williams & Connolly LLP 725 Twelfth Street, N.W. Washington, DC 20005 (202) 434-5000 <a href="mailto:amckinlay@wc.com">amckinlay@wc.com</a> <a href="mailto:sandrews@wc.com">sandrews@wc.com</a>	18-cv-4899 18-cv-4899
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		1:19-cv-01785 1:19-cv-01788 1:19-cv-01791 1:19-cv-01792 1:19-cv-01794 1:19-cv-01798 1:19-cv-01800 1:19-cv-01801 1:19-cv-01803 1:19-cv-01806 1:19-cv-01808 1:19-cv-01809 1:19-cv-01810 1:19-cv-01812 1:19-cv-01813 1:19-cv-01815 1:19-cv-01818 1:19-cv-01866 1:19-cv-01867 1:19-cv-01868 1:19-cv-01869 1:19-cv-01870 1:19-cv-01871 1:19-cv-01873 1:19-cv-01894 1:19-cv-01896 1:19-cv-01918 1:19-cv-01922 1:19-cv-01926 1:19-cv-01928 1:19-cv-01929 1:19-cv-01931
Acer Investment Group LLC	John C. Blessington K&L GATES LLP State Street Financial Center One Lincoln Street Boston, MA 02111 T: 617.261.3100 F: 617.261.3175 E: <a href="mailto:john.blessington@klgates.com">john.blessington@klgates.com</a>	18-cv-09841 18-cv-09797 18-cv-09836 18-cv-09837 18-cv-09838 18-cv-09839 18-cv-09840 18-cv-10100 18-cv-05053
American Investment Group of New York, L.P. Pension Plan		18-cv-09841

DW Construction, Inc. Retirement Plan		18-cv-09797
Kamco Investments Inc. Pension Plan		18-cv-09836
Kamco LP Profit Sharing Pension Plan		18-cv-09837
Linden Associates Defined Benefit Plan		18-cv-09838
Moirra Associates LLC 401K Plan		18-cv-09839
Newsong Fellowship Church 401K Plan		18-cv-10100
Riverside Associates Defined Benefit Plan		18-cv-09840
Robert Crema		18-cv-09841
Stacey Kaminer		18-cv-09841
		18-cv-09797
		18-cv-09836
		18-cv-09837
Alexander Jamie Mitchell III		18-cv-09839
David Schulman		18-cv-10100
Joan Schulman		18-cv-09840
Darren Wittwer		18-cv-09838
		18-cv-09797
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